

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MARLOW HENRY, on behalf of the BSC
Ventures Holdings, Inc. Employee Stock
Ownership Plan, and on behalf of a class of all
other persons similarly situated, E. STOCKTON CROFT IV,

Plaintiff, v. Defendants.

WILMINGTON TRUST, N.A.,
BRIAN C. SASS, and C.A. No. 19-1925-JLH

DECLARATION OF MARLOW HENRY

I, Marlow Henry, declare and state as follows:

1. I am a named Plaintiff and a proposed class representative in this action. 2. I am more than 18 years of age, am capable of making this declaration, and have personal knowledge of the facts set forth in this declaration and would testify competently under oath regarding the facts set forth in this declaration if called as a witness.

3. I submit this declaration in support of Plaintiff's Motion for Class Certification. 4. I was employed by BSC Ventures Holdings, Inc. ("BSC") as a baler from on or about January 2012 to on or about January 2019.

5. I have been a participant in the BSC Ventures Holdings, Inc. Employee Stock Ownership Plan (the "ESOP" or the "Plan") since the adoption of the Plan on January 1, 2015 and I am a vested participant in that ESOP.

6. I understand that this case is a class action brought on behalf of all persons who were vested participants in the ESOP and the beneficiaries of such participants. I further understand that this case aims to recover losses caused by ERISA violations in connection with the purchase of BSC common stock by the ESOP on January 14, 2016.

7. I agreed to be a named Plaintiff in this action and to act as a class representative of the certified class. I understood that this would entail having my name in the publicly-filed complaint, ongoing engagement with my lawyers (Class Counsel), and acting at all times in the best interest of the class.

8. I am committed to advancing the rights of other class members in this lawsuit. I believe I can fairly and adequately represent the interests of the members of the class, and I am not aware of any interest that would be adverse to or in conflict with those of the other class members.

9. I have been directly involved in monitoring and overseeing the prosecution of this action from the filing of the complaint to the present. Since I became involved in the case, I have communicated with my lawyers (Class Counsel) and have actively contributed to the case. Among other things, I have provided BSC- and ESOP-related information and documents to my counsel during the investigation of the potential claims in this action; I reviewed the allegations in the complaint and information in other documents filed in the course of this litigation; I assisted Class Counsel in discovery-related matters, including by searching for and producing documents to my lawyers, and responding to written interrogatories from Defendants; and I sat for a 1.5-hour deposition. I understand that I could be called to testify at deposition and/or at trial, and I am prepared to do so.

I declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury and under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge,

information and belief.

Executed at _2:50 pm_ Baltimore, MD on this __17th__ of December 2024.

_____*Marlow Henry*_____
MARLOW HENRY

